

**APPENDIX 2**



**Statement of Consultation  
For Regulation 12 (a)**

**Draft Eastbourne Park  
Supplementary Planning  
Document (SPD)**

**February, 2012**

**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Eastbourne Borough Council

---

## CONTENTS

	<u>Page No</u>
1. INTRODUCTION	1
2. WHO WAS CONSULTED AND HOW WERE THEY CONSULTED?	3
3. SUMMARY OF THE MAIN ISSUES RAISED AND HOW THESE HAVE SUBSEQUENTLY BEEN ADDRESSED	8
4. CONCLUSION	18

Annex A: Table Showing Summary of Representations, Officer's Comment and Council's Proposed Response

Annex B: Table Providing a Schedule of Proposed Changes to the Eastbourne Park SPD

DRAFT

---

## 1. INTRODUCTION

- 1.1 This statement of consultation has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Development) (England) Regulations 2012. It supports the Eastbourne Park Supplementary Planning Document (SPD), which has been published for adoption.
- 1.2 In preparing Supplementary Planning Documents (SPDs) local planning authorities are required to publish a statement (in accordance with regulation 12(a) setting out:
- The persons the local planning authority consulted when preparing the supplementary planning document;
  - A summary of the main issues raised by those persons; and
  - How those issues have been addressed in the supplementary planning document.
- 1.3 The Eastbourne Park SPD has been prepared by Eastbourne Borough Council. It was published for consultation commencing on 4 November, 2011 until Friday 27 January, 2012. Supplementary planning documents or SPDs are defined in the National Planning Policy Framework (NPPF) as *"Documents which add further detail to the policies in the Local Plan [in this case the Eastbourne Core Strategy Local Plan]. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan."*
- 1.4 The SPD has been prepared to set out a clear strategy for the future management of Eastbourne Park and will be used to guide development and in the determination of planning applications. It seeks to ensure the Park develops as an ecological, archaeological and leisure resource to benefit visitors and residents, whilst at the same time maintaining its function as an important flood storage area. It establishes a series of key principles and concepts for each part of the Park and provides greater

detail to support Policy D11: Eastbourne Park of the Eastbourne Core Strategy Local Plan.

- 1.5 The vision for Eastbourne Park will ensure an effective and sustainable balance of environmental, social and economic benefits. Within the areas of highest natural and historical value, the quality of the Park will be conserved and enhanced and this will be accompanied by the development of a unique visitor and educational centre. In other parts of the Park, appropriate outdoor leisure and recreational uses will be permitted and sustainable tourism will be encouraged. This will also involve making the Park more accessible through the creation of new footpaths and cycleways and the creation of a series of ecological green corridors.

DRAFT

## **2. WHO WAS CONSULTED AND HOW WERE THEY CONSULTED?**

### **Pre-Consultation**

- 2.1. Extensive consultation was undertaken during the preparation of the Eastbourne Park SPD. During this period, the Council engaged with landowners, developers, public sector organisations, local schools and local residents.
- 2.2. The preparation of the SPD was led by a Steering Group consisting of a cross-party group of councillors. A working group was also formed to provide more detailed information to inform the development of objectives and proposals. This consisted of Council Officers from a wide range of departments. The Steering and Working Groups also undertook visits to other wetlands including potential wetland management models that could be followed in Eastbourne Park.
- 2.2 A Stakeholder Event was held at the Winter Gardens, Eastbourne on Friday 3 July, 2009 to provide local organisations, landowners and other key stakeholders with an opportunity to inform the development of options for Eastbourne Park. The event was organised to provide local organisations and interested individuals an early opportunity to inform the selection of preferred options and objectives for what was originally proposed an Area Action Plan<sup>1</sup>. 110 letters were sent out to statutory organisations, local organisations and landowners, inviting representatives to come and discuss issues and options. The event was attended by twenty-eight stakeholders representing a range of organisations.
- 2.3 West Rise Junior School and Chris Greatorex a local archaeologist provided some archaeological exhibits at the event including reconstructions and replica artefacts from the Shinewater excavations dating from the Late Bronze Age.

---

<sup>1</sup> A decision was made to progress the document as a Supplementary Planning Document rather than an Area Action Plan following discussions with the Government Office for the South East.

- 2.4 Individual meetings and consultations have been held with key landowners including East Sussex County Council and the Trustees of the Chatsworth Settlement as well as other landowners with smaller parcels of land within the Park. In March, 2011, landowners were asked to complete a form setting out their short, medium and long-term plans for the land within their ownership.
- 2.5 The form requested individual details about the sites including the location, site area, current use together with requests for information about any particular constraints or other relevant information that would help inform the preparation of the document. The feedback helped inform the overall strategy and provided an indication of the types of uses that landowners envisaged for their respective parcels of land.
- 2.6 Throughout the preparation of the SPD, internal discussions and meetings have taken place. An Eastbourne Park SPD Officers' Working Group (including officers from a range of departments and disciplines) was established to help in the preparation of the document. Frequent meetings also took place between key officers and councillors on the Eastbourne Park Steering Group and the Local Development Framework Steering Group.

### **Formal Consultation**

- 2.7 Eastbourne Borough Council's Cabinet approved the draft Eastbourne Park SPD for public consultation, on 19 October, 2011. It was subsequently presented to the Council's Planning Committee for its consideration on Tuesday 25 October, 2011.
- 2.8 The document was subsequently published for a period of consultation prior to its adoption in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

2.9 The consultation took place over a 12-week period commencing on Friday 4 November, 2011 until 27 February, 2012. The SPD documents comprised the following documents:

- Draft Eastbourne Park SPD
- Statement of Consultation
- Guidance Notes for Making a Representation
- Statement for Representations Procedure
- Statement of Availability
- Response Form

2.10 Letters were sent to all specific and general consultation bodies. All other organisations, residents and businesses who have requested to be notified of all LDF consultations were also informed.

2.11 Notice of the consultation and locations where the document is availability have been given in a published advertisement that appeared in the local newspaper the Eastbourne Herald on Friday 4 November, 2011.

2.12 During the representation period, businesses, organisations and individuals were given an opportunity to comment on the document. Other consultation events included a stakeholder workshop (described in paragraphs 3.7-3.10 of this report), an unmanned static exhibition in Eastbourne Central Library, and a manned exhibition at the Arndale Centre.

2.13 A stakeholder presentation took place in the Court Room at Eastbourne Town Hall at 6pm on Thursday 8 December, 2011. The following members of staff from Eastbourne Borough Council coordinated and managed the event:

- Councillor Steve Wallis (Portfolio Holder for Development and Environment);
- Iona Cameron (Planning Policy Manager);
- William Nichols (Principal Planning Policy Officer); and

- Matt Hitchen (Planning Policy Officer).

- 2.14 Upon arrival, all attendees were given a delegate pack containing a copy of the stakeholder presentation and an Eastbourne Park SPD summary brochure (see Annex C). The room was set up with four tables arranged in cabaret style and attendees were invited to sit where they wanted. Each table had a copy of the Eastbourne Park SPD, some sheets of flipchart paper and some marker pens.
- 2.15 A display board setting out the key features of the Eastbourne Park SPD was set up to provide attendees with a clear, visual summary of the key issues contained in the document and attendees were free to view this information before and after the presentation. Additional copies of the Eastbourne Park SPD were available to view.
- 2.16 Steve Wallis (Portfolio Holder for Development and Environment) welcomed stakeholders and interested parties and gave a short introduction to the Eastbourne Park SPD and set out the Council's commitment to protecting and enhancing the Park for existing and future generations. He then introduced the Planning Policy representatives who then coordinated the event.
- 2.17 William Nichols (Principal Planning Policy Officer) gave a presentation setting out the background to the Eastbourne Park. He set out the reasons why the Council is producing an SPD for Eastbourne Park and advised stakeholders of the previous consultation stages that had taken place in order to get to this stage. He advised that the document was intended to set out a clear strategy for the future management of Eastbourne Park and will be used to guide development and in the determination of planning applications.
- 2.18 Following the presentation, attendees were invited to consider a series of questions and then given an opportunity to ask any further questions of their own.



DRAFT

### **3. SUMMARY OF THE MAIN ISSUES RAISED AND HOW THESE HAVE SUBSEQUENTLY BEEN ADDRESSED**

3.1. A comprehensive analysis of the Stakeholder Event at the Winter Gardens on 3<sup>rd</sup> July, 2009 is contained in the Stakeholder Event Feedback Report. A summary of the key issues raised and points that were considered have been listed below, together with a response setting out how these issues have been taken into account:

- *Should the Broadwater sector include Hampden Park?* Hampden Park is not well-related to Eastbourne Park and serves a different function. It has therefore been excluded from Eastbourne Park. However, Hampden Park will be protected through Policy C7: Hampden Park Neighbourhood Policy of the Core Strategy.
- *What will happen to the housing allocations and where will they go with Government restrictions on developing the flood plain?* The Council has prepared a spatial development strategy that gives priority to previously developed sites, together with some development on a number of small Greenfield sites within the urban area. The Council's spatial approach does not require additional Greenfield sites within Eastbourne Park.
- *What is now proposed for the housing development site at Kings Drive?* The King's Drive/Cross Levels Way site was allocated for housing in the current Eastbourne Borough Plan 2001-2011 and was granted outline planning permission on 27<sup>th</sup> October, 2011 following a successful appeal by the applicant (Planning Application Ref: EB/2010/0003 and Appeal Ref: APP/T1410/A/10/2128090/NWF). The site was Eastbourne Park boundary has subsequently been amended to reflect this.
- *How will the area become accessible for informal recreation including footpaths and cycleways, as there are so many landowners with different objectives?* Whilst there are several

landowners within Eastbourne Park, approximately 90% of the land is owned by just three landowners: Eastbourne Borough Council, East Sussex County Council and the Trustees of the Chatsworth Estate. The Council has engaged closely with East Sussex County Council and the Trustees of the Chatsworth Estate as well as with other landowners to try to resolve any issues.

- Bring all partners together and develop detailed and complex policies. Provide clear roles, responsibilities and budgets.
- Prevent commercial carve up of the area. Policy D11: Eastbourne Park of the Submission Core Strategy and the Eastbourne Park SPD set out
- *Do not provide more relief roads.* East Sussex County Council has deleted many of the previously proposed relief roads from its proposals including the Southbourne and Tutts Barn Links. The only remaining road proposal that East Sussex County Council remains committed to is the St Anthony's Link.
- *Have small scale, high quality developments along fringes at areas with lowest risk of flooding and least traffic impact.*
- *Any developments should retain and enhance ecological links and green corridors to perimeter parks, streams and levels.* The Council is committed to enhancing ecological links and green corridors and is committed to the development and enhancement of six Green Network Corridors
- *Recognition of the environment as the opportunity, not as a challenge or issue.* The Eastbourne Park SPD acknowledges the role of the Park as an important ecological asset and the approach taken has sought to preserve and enhance it for current and future generations.

- *Provide a full archaeological evaluation through history for the whole area.* The Council has worked closely with the County Archaeologist and seeks to designate an area of the Park as a Scheduled Monument.
- *Develop a long-term vision with a hydrological management plan for flood protection incorporating climate change. Not just engineering solutions, but providing biodiversity enhancement, archaeology and current planning policy.*
- *Expand and create new lakes for further flood storage.* The Eastbourne Park SPD acknowledges that existing lakes may need to be extended for additional flood storage purposes.
- *Improve habitats, create wildlife areas and long term management plans for wildlife areas.* Conservation of the natural environment is a key element of the Eastbourne Park SPD The SPD seeks to designate an area within the West Langney sector with statutory protection as a Local Nature Reserve and supports the creation of a regionally important wetland visitor centre.
- *Zone areas for different uses and activities.* The Eastbourne Park SPD acknowledges the different characteristics of the Park and the different sectors of the Park have been identified as having potential for different types of uses and activities.
- *Tourism interests has the potential to be big. Rename 'Eastbourne Park' and the 'sewers' to give a better impression of what is actually there.* The Council is proposing to change the name of the Horsey Sewer for the purposes of the new cycle route.
- *Limit tourism and leisure activities to those which do not have an adverse impact on the environment and landscape.* The Council recognises that Eastbourne Park is an under-utilised leisure and recreation resource.

- *Provide educational and community facilities, including a wetland visitor centre, which includes interpreting the Pevensey Levels.* A key element of the Eastbourne Park SPD is to deliver a Wetland Visitor Centre within the high ecology area of the West Langney sector.
- *Consider funding including consultants' studies, flood protection works, maintaining and managing schemes.*
- *Provide a long-term management plan for land owned by Eastbourne Borough Council.* The Eastbourne Park SPD supports the creation of a management forum or group representing all landowners and interested parties.
- *Eastbourne Borough Council has an obligation to provide sufficient allotments, extending existing areas.* The Council acknowledges its important role in providing allotments and it has prepared an Allotment Strategy, which sets out its proposals for future allotment provision. Several allotments sites within the Park have been identified as having potential for increased capacity. These include the creation of some new allotments at Churchdale Road, together with an extension to provide an additional 2,72 hectares of land (with new fences, gates, access roads, car parking, toilet facilities and the installation of water); a 0.18 hectares extension to the Manor Road allotments; and the reuse of the former allotment land at Durley Field.
- *Provide well-signed, quality access routes through the Park with strategic car parks. Improve way marking of access points for cycleways.* The Eastbourne Park SPD aims to provide a safe, clearly sign-posted network of footpaths and cycleways throughout the Park

- Provide pleasurable access routes for the community. These will link housing, services and recreational facilities, provide commuting and recreation opportunities with road crossings.
- *Have compatible water recreation on West Langney Lake.* Policy D11 of the Core Strategy recognises the needs for water-based recreation to be appropriate and non-motorised and not have an unacceptably detrimental impact on wildlife and ecology.
- *West Rise Junior School is interested in managing West Langney for education.* The Council is keen to work with local schools.
- *Include Hampden Park so that the objectives benefit local residents in deprived areas.* The Eastbourne Park SPD seeks to provide greater opportunities for its residents to lead healthy and active lives and reduce the negative effects of deprivation and social exclusion. A key element of the SPD is to enhance access to and from the Park.

3.2 Landowner Response Forms were received from some landowners and the responses received are set out in a table in Annex 3: Summary of Responses to Landowner Response Forms.

3.3 Richard J Maile/David W Bowerman identified a 2ha site at land to the north-west of Hammonds Drive and fronting Lottbridge Drove as having development potential and suggested it could be used as a new police headquarters.

3.4 East Sussex County Council, as landowner of much of Shinewater Park identified the site's amenity and wildlife uses and drew attention to an existing management plan, the implementation of which was resource dependent.

3.5 Matthew Trigg at RWE NPower PLC identified a 4.2ha site at the former railway sidings immediately north of the Bedfordwell Road depot site as having development potential for uses to be agreed with the Council.

3.6 Following the presentation, stakeholders and interested parties were invited to consider a series of questions the Portfolio Holder for Development & Environment and Planning Policy Officers were available to provide guidance and answer queries from stakeholders.

- Do you agree with the broad approach established in the Eastbourne Park SPD?
- Have we achieved an effective balance between natural/historic conservation and leisure/tourism?
- Is there anything else that the Council should be doing to protect the Park for future generations?

3.7 When asked to consider whether or not they agreed with the broad approach established in the Eastbourne Park SPD, the following feedback was received:

- It is a very broad question and consequently therefore difficult to say;
- The broad objectives are good;
- The St Anthony's Link road could lead to unwelcome development;
- Traffic and roads can cut off wildlife corridors (e.g. the Eastbourne Park road links);
- Cycle routes should cover the whole area and need to be more visible;
- More detail is required and the document should be more structured;
- It is difficult to agree or disagree without more detailed proposals; and

- The document has a good structure but it requires additional detail about the deliverability of individual proposals.

3.8 When asked to consider whether the Eastbourne Park SPD had achieved an effective balance between natural/historic conservation and leisure/tourism, the following feedback was received:

- It is difficult to say whether or not the document has achieved an effective balance;
- The balance is good if the quality of the Park is high;
- There should be more sports activities for teenagers and young people;
- The document needs greater clarity and specific proposals with accompanying diagrams;
- The quality of any new buildings within the Park should be high;
- There is considerable scope and potential to create a high quality network of cycle routes and ensure that Eastbourne fulfils its potential as a cycle town;
- There should be a new cycle route linking St Wilfred's Hospice with the lake;
- A new group could be set up 'Friends of Eastbourne Park'; and
- The SPD needs to be a bolder document: the Park represents a huge opportunity to create a new water-based residential development for the Borough.

3.9 When asked to consider if there is anything else that the Council should be doing to protect the Park for future generations, the following feedback was received:

- It is important the policies are delivered and as quickly as possible;
- Southbourne should be retained as a natural area;



- Care needs to be taken to ensure that the Park is not carved up by new roads;
- Hampden Park should be included within Eastbourne Park;
- There needs to be an assurance that Hampden Park's exclusion from Eastbourne Park does not mean that it is not protected;
- There is a need to make more of the Park's leisure and tourism ability and understand the increased scope to generate additional income;
- It is important for local residents to 'buy in' to the proposals and become passionate about the Park;
- The Park will have to be economically viable and 'pay for itself';
- The document as a whole is too general and not sufficiently specific; and
- The vision needs more clarity.

3.10 Over the course of the consultation period, the Council received a total of 58 representations from 18 consultees. Respondents included landowners, developers, other statutory public sector organisations, local schools and local residents. The principal comments requesting substantive changes to the document related to the following:

- The exclusion of Hampden Park and requests that the Plan be amended to include it within the overall boundary (Friends of Hampden Park);
- The boundary of Eastbourne Park, which does not reflect the extant planning permission at Bedfordwell Road Depot (Places for People);
- Water quality and the need for a maintenance plan for flooding (Environment Agency);
- Request to include land north of Hammonds Drive for a new police headquarters (Richard Maile); and
- The possibility of wind turbines as a renewable energy source (Strutt & Parker on behalf of the Trustees of the Chatsworth Settlement).

- 3.11 The feedback received from this consultation exercise and the formal responses given, have helped inform and shape the final version of the SPD. Annex A provides a summary of the representations received and sets out the officer's formal comment and response to each. It then sets out whether or not the Council is proposing to amend the document to take account of the representations received.
- 3.12 Many changes to the Eastbourne Park SPD have come about as a direct consequence of representations received during the formal consultation. In addition, several other amendments have been made to take account of up-to-date legislation or national policy or to take account of other changes that have taken place since the original document was prepared. These changes have been incorporated into the final version of the Eastbourne Park SPD.
- 3.13 Annex B provides the complete breakdown of all the changes being made. These include:
- Reference to the National Planning Policy Framework and the Technical Guidance to the National Planning policy Framework, which have replaced Planning Policy Statements and Planning Policy Guidance Notes, since the draft SPD was originally prepared;
  - An update to include reference to the consultation events that took place between 4 November, 2011 and 27 January, 2012;
  - Minor amendments to the boundary of Eastbourne Park to reflect an extant planning permission at the Bedfordwell Road depot site;
  - Clarification that the proposed pedestrian and cycle routes set out in Figure 7 are indicative and that the detailed route planning of these will involve landowners and stakeholders;
  - Amendments to the text in recognition of the recent designation of the Bronze Age settlement at Shinewater as a Scheduled Monument;
  - Deletion of reference to the need for increasing the capacity of outfalls to the sea following advise from the Environment Agency;
  - Clarification of the status of the St Anthony's Link Road to reflect the fact that no financial resources have been allocated to it;

- Deletion of Table 4: Monitoring Framework as this is not required and replicates the detail set out in the Core Strategy's monitoring framework.
- Amendments to the Glossary to reflect recent changes in national legislation, policy and guidance.

DRAFT

#### **4. CONCLUSION**

- 4.1 The Statement of Consultation for the Eastbourne Park SPD has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 outlines which organisations and individuals was consulted in the preparation of the document, the main issues that were raised during consultation exercises and how these issues have been addressed. It also demonstrates how the document accords with the Council's adopted Statement of Community Involvement.

DRAFT

**Annex A: Table Showing Summary of Representations, Officer's Comment and Council's Proposed Response**

DRAFT

**Annex B: Table Providing a Schedule of Proposed Changes to the Eastbourne Park SPD**

DRAFT